

UNITED STATES DISTRICT COURT
OF PUERTO RICO
CASE NO. 22-CR-00342-SCC

UNITED STATES OF AMERICA,
Plaintiff,
v.

MARK T. ROSSINI,
Defendant.

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UNOPPOSED MOTION TO TRAVEL

Mark Rossini (“Mr. Rossini”), through undersigned counsels, respectfully requests that Your Honor allow him to travel to Old Orchard Beach, Maine, from November 22, 2023 to November 26, 2023, to spend Thanksgiving with his family.

1. Since his release Mr. Rossini has been residing with his father in New York. (DE 23). His family usually travels to New York for Thanksgiving and spends the holiday at his father’s home. This year, however, his father’s home will begin to undergo repairs and the family has decided to spend Thanksgiving at his cousin’s house in Old Orchard Beach, Maine.
2. With the Court’s permission, Mr. Rossini has traveled five times without incident.¹

3. Details regarding Mr. Rossini’s travel itinerary and contact information will

¹ To Spain, from September 23, 2022 to October 19, 2022, to receive cancer treatments; (DE 98); To Spain, from December 20, 2022 to January 25, 2023, also for medical treatment. (DE 141); To Spain, from February 27, 2023 to March 13, 2023, for cancer treatment. (DE 166); To Spain, from April 4, 2023 to May 13, 2023, for cancer treatment. (DE 182); and To Spain, from September 14, 2023 to October 10, 2023, for cancer treatment (DE 259).

be provided to Mr. Rossini's assigned probation officer, and to the Court under seal upon request.

4. Assistant U.S. Attorneys Nicholas Cannon and Ryan Crosswell do not object to this request.

WHEREFORE, Mr. Rossini respectfully requests permission to travel to Old Orchard Beach, Maine, from November 22, 2023 to November 26, 2023, to spend Thanksgiving with his family.

Respectfully submitted,

/s/ Lydia Lizarribar Masini

LIZARRIBAR MASINI LAW OFFICE

G-14 O'Neill Street, Suite A

San Juan, PR 00918

(787) 250-7505

lizarribarlaw@gmail.com

**STUMPHAUZER KOLAYA NADLER &
SLOMAN, PLLC**

Two South Biscayne Boulevard,

Suite 1600

One Biscayne Tower

Miami, FL 33131

Telephone: (305) 614-1400

Facsimile: (305) 614-1425

/s/ Michael B. Nadler

Michael B. Nadler

Fla. Bar No. 51264

mnadler@sknlaw.com

Admitted pro hac vice

/s/ Juan J. Michelen

Juan J. Michelen

Fla. Bar No. 92901

jmichelen@sknlaw.com

Admitted pro hac vice

Attorneys for Mark T. Rossini

CERTIFICATE OF SERVICE

I certify that on November 4, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

/s/ Juan J. Michelen
Juan J. Michelen